

**Document:** Proposed Plan for Operable Unit 8, Anaconda Copper Mine, Lyon County, NV, November 2016  
**Reviewer:** Yerington Paiute Tribe

**Specific Comments:**

#	Page	Comment
1	1	The Draw down fluids are described in the document as “containing elevated Total Dissolved Solids” with the more toxic components are left unmentioned. In the HRS Documentation Record, the fluids are described as “Hazardous substances in PLS collected from these ponds include arsenic, cadmium, chromium, copper, lead, manganese, nickel, uranium, and zinc.” In addition, this statement is inconsistent with Table 1. Although the elevated TDS is important to management and the description in the document brief, future discussions of the draw down fluids should be more accurate and mention the heavy metals and radionuclide issues.
2	2	The document states “Site-wide stormwater connections are part of the proposed alternative; connections to the OU-8 stormwater system will be completed as adjacent areas undergo remedial action.” Having only part of the site, and in this case a section within the site, have a stormwater system not connected to the site is not technically feasible. What happens at the dead ends? Will a temporary outlet be constructed to by-pass unfinished sections?
3	3	The Mine History has no reference to the actual responsible party, BP, which wholly owns ARC. It is clearly described on previous EPA documents including the EPA website for the site ( <a href="https://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/ViewByEPAID/NVD083917252">https://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/ViewByEPAID/NVD083917252</a> ). With the public well aware that BP is the responsible party, it is important for the document to be consistent; masking the actual responsible party’s name is an inconsistency that reduces credibility.
4	4	The document states “Also in 2009, a mining company, Singatse Peak Services (SPS) agreed to purchase mineral rights and surface land in OU-8, with the intent of re-processing the recoverable copper in the solids and liquids as part of an overall site-wide mining plan.” It is an important fact that in 2009 SPS agreed to purchase the site but the referenced site-wide mining plan is not part of the site record and may not actually exist. It would appear that with the gap between purchase and the absence of a plan to utilize material in OU8 for additional re-processing that this activity is not to be considered in future plans. The reference to a “site-wide mining plan” that include OU-8 is not accurate.
5	5	“...work on these OUs [OU-2, OU-4b, OU-5, and OU-6] will proceed once the priority OUs have finalized the RI and FS...” This statement communicates that the OUs are complete and separate units; however, there are actions that maybe required to include these lesser priority OUs that will occur concurrently to the remediation activities of the higher priority OUs. It is suggested that this be rephrased to state that work may be completed concurrently if associated with the remediation activities of higher priority OUs.

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**Specific Comments:**

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6	13	It is assumed that any cap will include moisture sensors to allow confirmation of modeling/performance of the cap. This is a practice occurring at other mine sites in Nevada including the Barrick Goldstrike Mines Inc. (BGMI) facility in Elko (Zhan 2006)
7	13	Dust control for the E-cell may be required for solids left by the fluids as they evaporate and should be a factor when selecting "fine-grained alluvium" for the cells. It would be assumed that O&M would include steps to reduce this issue but it should be specified in follow-up design since it is omitted in the Plan, FFS and Closure Plan.
8	13	It is unclear how a E-cell will be closed when no longer needed or when its service life is complete.

**General Comments:**

9. Evapotranspiration covers are an excellent option to be considered for this site. The lower maintenance and better aesthetics of a vegetated cover are all positive qualities of the system. However, the proposed 2-foot cover will require a more complete investigation and is likely underestimating the final cover thickness. A number of factors will be used to evaluate final cover design:
  - A. Comparable facilities and their performance. Barrick Goldstrike Mines Inc constructed an evapotranspiration (ET) cover system for the AA Leach Pad in 2000. However, unlike the 2-foot cover proposed, the system includes 1.2 meters of cover under 1.5 m of salvaged topsoil (total of 8.8 feet) (Zhan 2006). Although it is assumed that the cover material will have different properties and the BGMI facility receives more rainfall, an over 75% reduction in thickness is an unlikely estimate.
  - B. The 2-foot cover is not appropriate for the vegetative cover:
    - a. Erosion prevention is often cited as the major issue with ET cover systems (Breckenridge 2010). This often makes the vegetative cover critical. However, a 2-foot cover will put as much of 80% of the roots terminating, or trying to terminate, in the covered material reducing viability of the cover. A 2-foot cover may not be adequate to support needed vegetation and that vegetation will be penetrating the cover potentially reducing its viability.
    - b. Plants with roots below the cap will bioaccumulate heavy metals associated with the waste increasing the ecological and human health risk (Garvin 2013). It is also noteworthy that once plant material uptakes heavy metals and radionuclides these hazardous components are released through use by residents, animals and as plants mature and drop leaves, releases seeds or die back in winter.

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**General Comments (continued):**

10. Stormwater leaving the site has been recently well documented by residents and is evident from gullies and other erosion features throughout the site. The inclusion of stormwater management in the proposed plan is a step forward, but development of stormwater control features for one Operable Unit that is almost completely surrounded by other Operable Units is questionable. The question remains, what happens to the water when it reaches lower elevation other Operable Units? Will it be stored permanently onsite? The answer to these questions is to develop a site wide stormwater management program.

The Clean Water Act requires permits for storm water discharges associated with industrial activities to waters of the United States. The EPA is managing the Yerington Anaconda Mine Site under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) authority. In accordance with CERCLA, the discharge of storm water associated with sites such as the Yerington Mine Site should comply with the substantive requirements of the storm water permit program; however, CERCLA response actions are exempted by law from the requirement to obtain Federal, State or local permits related to any activities conducted completely onsite. Despite this, releases from the site are required to be controlled for a variety of reasons. In this case, even without the stormwater permit requirement, for any party otherwise liable for a release, it creates liability for damages for injury to, destruction of, or loss of natural resources including the costs of assessing such injury, destruction or loss resulting from such a release. It is generally accepted that exemption from stormwater permitting in this case is not a release from liability. Subsequently, Superfund sites generally have plans and facilities to manage stormwater.

It is recommended that a site-wide stormwater plan, long overdue, be developed concurrent with the design of OU8. Without a design for the entire facility, it will be technically impossible to evaluate the effectiveness of the OU8 proposed plan in regards to surface water.

11. The Tribe has previously commented on the Human Health Risk Assessment in December of 2012. There are a number of very important general items that must be corrected for this Risk Assessment to meet the needs of Tribal residents. These general issues include:
  - Overestimating security: Site fencing and other security measures fall short of what is normally expected at a site of this size and severity. Previous reviews included photos of both intruders and game animals on site, which are important factors of exposure for the entire site.

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**General Comments (continued):**

- Tribal cultural practices are completely disregarded: There is mention of this issue but absolutely no inclusion of information provided by the Tribe or use of guidance documents created through Superfund programs for Tribes. The end result is a Risk Assessment that is exclusive to the non-Tribal community and disregards EPA's trust responsibility to the Tribe.
- There is no Conceptual Site Model for this site: The Tribe worked with EPA to address many important issues with the Conceptual Site Model several years ago. As of the last conference call, EPA had not forwarded those modifications to BP and there appears to be no progress on this important site-wide document despite efforts by both the YPT Environmental Office and Administration. This is very unfortunate since important components of the HHRA now found lacking could be "cut and pasted" from a functioning Conceptual Site Model.
- Assumptions regarding offsite conditions in the HHRA are incorrect: The data set regarding effects of dust and other transported solids offsite is very limited. In contrast, information regarding actual transport of these materials is substantial. Adding to this problem, the location of site features is misrepresented to the point of obscuring risk; the town of Yerington is adjacent to the site (not 1.5 miles from the site), or more specifically, the Anaconda Mine is located *in* Yerington, and the Reservation is an "onsite" condition since OU7 includes Tribal trust property. The Tribe has repeatedly requested additional offsite studies of soil and biota from EPA. EPA's continued lack of pro-active response to our request is troubling.

12. Capping of the piles and establishing the vegetation critical to preventing erosion on ET covers. However, this change in habitat also changes exposure to biota. As stated in the Final Feasibility Study (EPA 2016):

"...if HLP surfaces are modified or improved to establish vegetation, potentially introducing other biota, potential exposure and adverse effects to plants, soil invertebrates, and wildlife might result, or if the HLPs are altered to provide habitat for birds and mammals, further risk analysis would be needed."

The result is that ecological risk assessment will be an important tool for ET cap design. For example, since burrowing animals are part of that risk and are significant risk to releases into the food chain, it is unknown how two feet of cover will provide adequate protection. Adding to this the comments above regarding plant uptake and root depth.

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**General Comments (continued):**

13. The document states that “Agricultural products grown in the area have been tested and there is no evidence that OU-8 or the Anaconda Copper Mine Site has had any impact on agricultural production. Most agriculture fields in the Mason Valley are located away from the Anaconda Site, either hydrologically up-gradient or not hydrologically connected to the Site at all” on page 6. This statement is incorrect:

1. Agricultural fields are adjacent to the site
2. Agricultural fields are downgradient from the site
3. Irrigation water used on the fields (Honeywell Ranch Well) has been found to be contaminated with mine waste resulting it its use discontinued. Other irrigation wells are in an area of groundwater known to be effected.

The only other evidence for this conclusion (no impact to agriculture) known to the Tribe is the results of a January 9, 2009 Technical Memorandum (*Onion Sampling, Peri Farm, Yerington, Nevada*, prepared by CH2M Hill) regarding the issue of farm products from a single field adjacent to the mine. In that report, a total of four onions were analyzed for uranium. Results showed relatively low levels of uranium (the only analysis conducted) although a uranium was found in all samples in a wide range of concentrations. The onions themselves had already been packaged for processing and/or distribution in fields near the site prior to sampling (placed in “field bags” for the processor). Contrary to the report title, the onions may or may not have been from an area near the mine or even irrigated with groundwater due to use of Walker River water by the farm in question and their use of other properties extending beyond Mason Valley.

The 2009 study states that “the technical approach to onion sampling was not meant to be a standard, statistically-defensible approach”. The small and limited study does not include the other mine-related heavy metals or radionuclides, other crops in the area or even those regularly irrigated with the groundwater in question. The field used for the study is preferentially irrigated with surface water from the Walker River. The focus and results of the study indicated that onions from that producer did not contain concentrations of uranium of a concern for human health. This result is not disputed, only its broader application to other locations, crops and heavy metals and radionuclides released from the mine site.

Multiple peer reviewed studies have determined that onions uptake uranium far less than other common crops (Saric 1995, Dushkenov 1997). Other crops grown in the area such as alfalfa and crops planned for the area such as lettuce have both been found to uptake uranium (Ebbs 1998, Saric 1995, Dushkenov 1997). The same research indicates that uranium was found to be highest in leaves, particularly older leaves, and lowest in storage organs such as corn cobs and grain (0.04 and 0.05 mg/kg U), bean pods and seeds (0.07

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**General Comments (continued):**

and 0.02 mg/kg U) and onion bulbs (0.07 mg/kg). The tops of the onions for the EPA study were actually removed and not analyzed despite being an edible portion of the plant.

Overall, previous research has clearly indicated that onions are one of the poorest indicators of uranium uptake. The absence of uranium in onions does not correlate to other plants. Additionally, onions would be a crop *recommended* for agricultural areas managing uranium issues to limit uptake in plants.

The second question for this study is the use of uranium as an indicator for other metals released from the site. Arsenic, copper and other metals are noted for concentrations above standards in groundwater associated with releases from the mine that includes groundwater used for irrigation. It is interesting to note that uranium is not associated with uptake in onion bulbs but other metals associated with site, arsenic, has been associated with preferential uptake in similar plant structures; radish hypocotyls (Gaw 2008). When plants are grown in soils containing arsenic, cadmium, copper and uranium, accumulation is expected to be highest in leaves compared to storage organs such as onion bulbs (Gaw 2008, Saric 1995). In summation, it is not clear from the literature reviewed if uranium would be an effective indicator for other mine waste constituents known to have been released from the site. Considering past research, it must be concluded that uranium *alone* is not an appropriate indicator of the effects the site is having on local agriculture. This is particularly important since historical releases to surface water and from dust storms prior to recent dust control measures may have resulted in elevated concentrations in soil (Figure 4, Figure 5, and Figure 6). No data on soil concentrations was included or discussed in the 2009 EPA study and no analytical data on irrigation water was provided.

Considering both the actual science available for uptake of uranium in onions and the absence of data on other heavy metals and radionuclides released by the site, it is very clear that EPA is overstating the application of the January 9, 2009 study in the Proposed Plan. It is also noteworthy that the Tribe has repeatedly asked for realistic studies of the effect of the mine on agriculture concurrent with effects on other plants collected by Tribal members (Attachment 1).

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**General Comments (continued):**

14. For Alternative 3, which includes a 4-foot cover, it is described as:

“This alternative more closely approaches mine closure practices under the Nevada Administrative Code. The new FMS facilities would meet State of Nevada ARARs and combined with the HLP covers would provide a reasonable chance of meeting state ARARs for groundwater protectiveness. This alternative would likely comply with HLP closure requirements. Full compliance with all ARARs would depend on the effectiveness of the ET cover and condition of existing HLP liners and portions of the FMS.”

The 2-foot cover is described as:

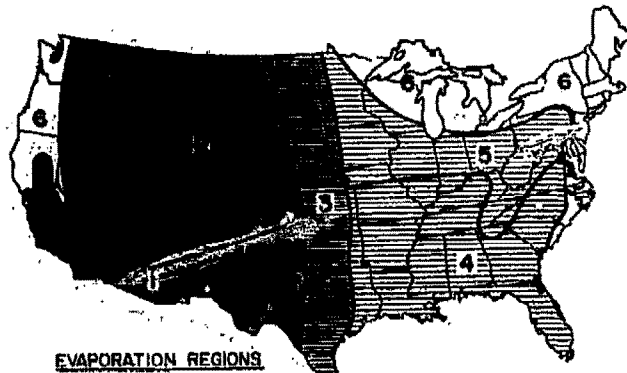
“This alternative is consistent with similar HLP closures recently approved by NDEP under the Nevada Administrative Code. The new FMS facilities would meet State of Nevada ARARs and combined with the HLP covers would provide a reasonable chance of meeting state ARARs for groundwater protectiveness and HLP closure requirements.”

The difference is that 4 foot and deeper minimum caps are part of the current practice. It can be assumed that the 4 foot minimum caps exist and have been used regionally. The language is misleading since 2 foot caps may be proposed but 4 foot plus ones are actually in use.

**Summary**

The design restriction on page 13 “full compliance with all ARARs would depend on the effectiveness of the ET cover and condition of existing HLP liners and portions of the FMS” is very important to moving forward with the design. The ET cover must be designed around the water balance and to reduce the hazard (including plant uptake and other ecological factors that result in human health risk) and not set to an arbitrary depth. Additionally, the assumption that current liners are fully functional will need to be proven considering their age and history.

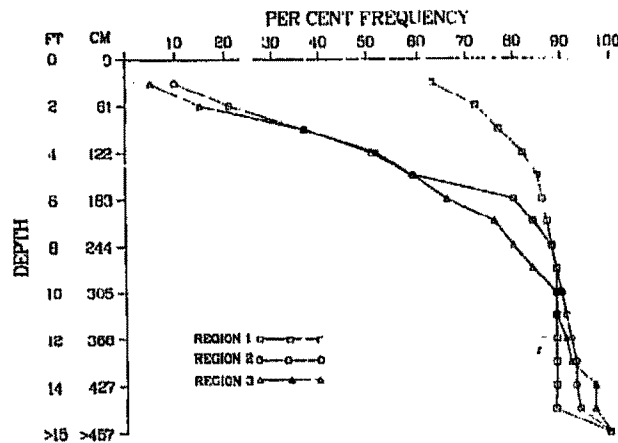
Management of stormwater is very important and its specific mention in this proposed remedy is a step forward for the site. However, to be realistic, it must connect to a site wide program that will need to be designed and implemented in the short term.



#### EVAPORATION REGIONS

1. EVAPORATION MUCH IN EXCESS OF PRECIPITATION
2. EVAPORATION CONSIDERABLY IN EXCESS OF PRECIPITATION
3. EVAPORATION USUALLY IN EXCESS OF PRECIPITATION
4. EVAPORATION IN EXCESS OF PRECIPITATION IN WARM MONTHS
5. PRECIPITATION IN EXCESS OF EVAPORATION IN COOLER MONTHS
6. PRECIPITATION GENERALLY IN EXCESS OF EVAPORATION (42)

Regions of evaporation in relation to precipitation.



Cumulative cumulative frequency of rooting depth of plants as related to evaporative regions.

Figure 1. Average root depth for native plants by region. For Region 2, where the site is located, it can be expected that generally 80% of plants could penetrate the proposed 2 foot cover. Figure 13 and 14 from Foxx 1984.



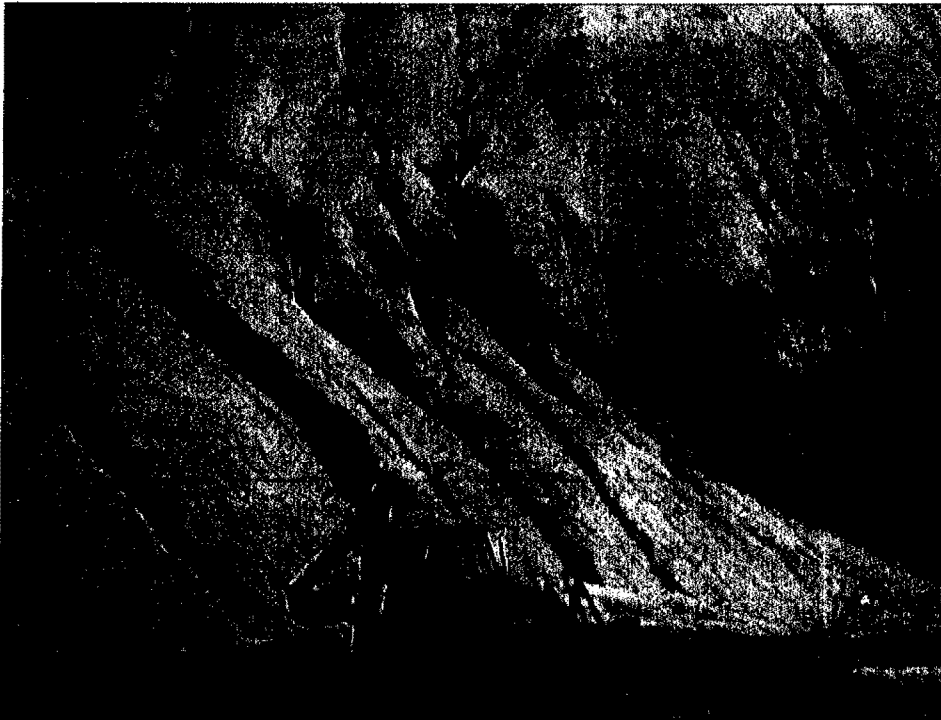


Figure 2. Erosion on the north end of the site requiring mine waste to be removed from a field at Peri Farms that is used for onions and alfalfa. Photo from July 2013 by YPT Environmental Office staff.

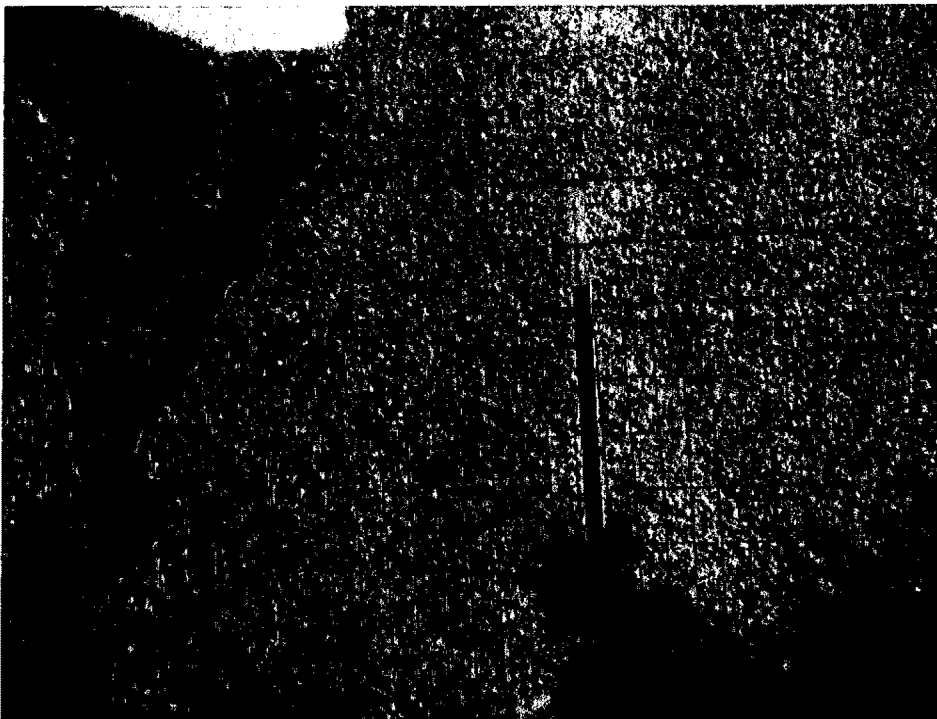


Figure 3. Erosion near the VLT piles, east side of the site. Note the perimeter fence in the foreground. Like Figure 2, the photo shows mine waste transported offsite due to uncontrolled stormwater flows. Photo from July 2013 by YPT Environmental Office staff.

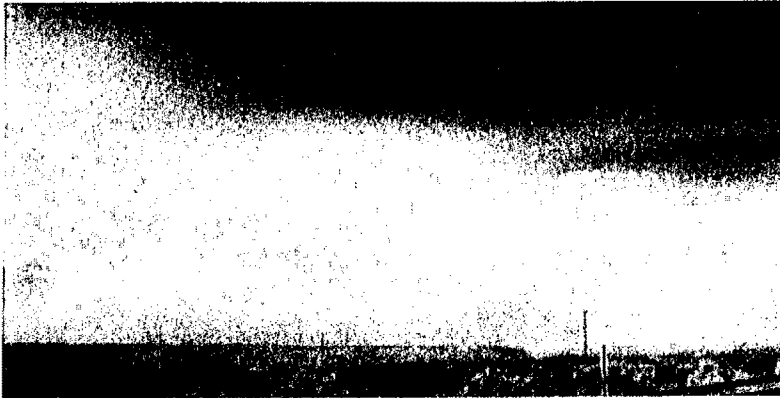


Figure 4 (left). Dust coming from the north end of the site moving across agricultural fields (hidden by the dust cloud at the toe of the pile). The photo was taken in 2000 after dust control measures by mine operators, but prior to temporary efforts directed by NDEP and limited efforts directed by EPA.

Figure 5 (right). Dust

moving off of the evaporation ponds at the northwest corner of the Anaconda Mine CERCLA site on February 29, 2012. Agricultural fields can be seen in the background beyond the evaporation ponds. Currently, there is no air quality monitoring between the evaporation ponds and agricultural fields.

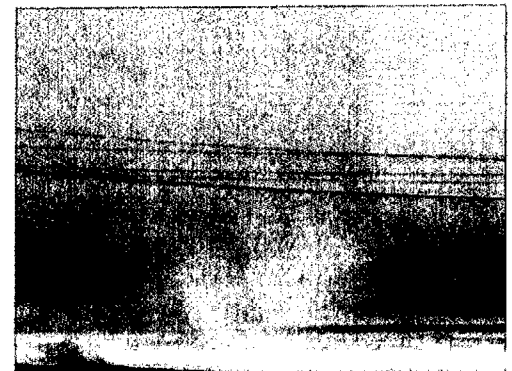
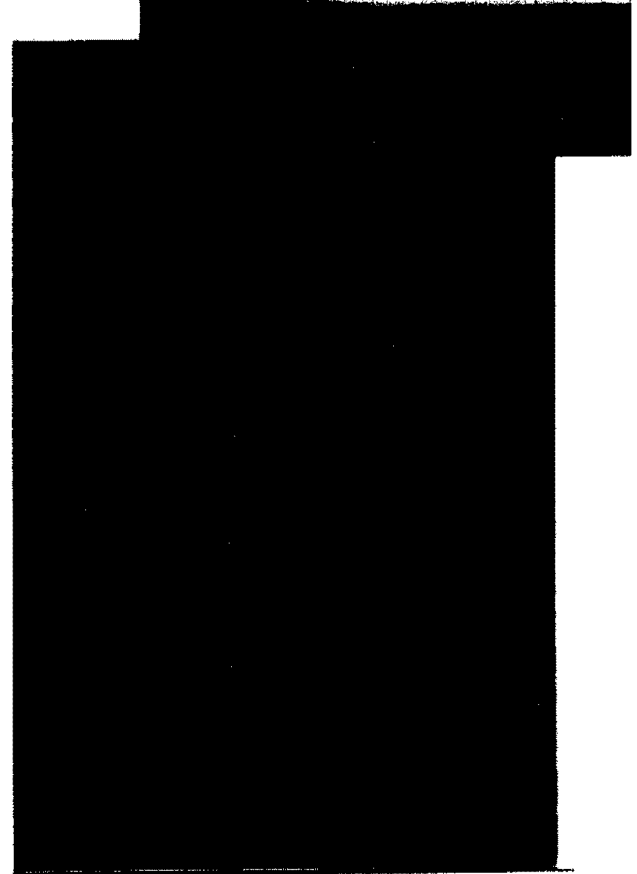


Figure 6 (left). Wabuska Drain, spring of 1983, with fields now used for onion and alfalfa production shown on either side. The red color is from mine waste via surface drainage from the site and/or shallow groundwater. Photo provided by Stan Wiemeyer of the USFW.



## References Cited

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## **ATTACHMENT 1**



**YERINGTON PAIUTE TRIBE**  
171 Campbell Lane  
Yerington, Nevada 89447  
Ph. (775) 463-3301  
Fa. (775) 463-2416

January 13, 2012

**Tribal Chairman**  
Linda L. Howard

**Vice-Chairman**  
Kenneth Roberts

**Member**  
Lorelin Johnson

**Member**  
Laurie Erwin

**Member**  
Claudia Saunders

**Member**  
Lisa Williams

**Member**  
Victor Sam, Sr.

**Tribal Manager**  
Deborah Dutton  
**Secretary of Record**  
Sheley Pugh

Jane Diamond  
Director  
U.S. EPA Region IX  
Superfund Division (SFD-1)  
75 Hawthorne Street  
San Francisco CA 94105

RE: Request for a study of the threat to area agriculture created by the  
Anaconda Mine Site (EPA #: NV1083917252).

Dear Ms. Diamond:

As a member of the Mason Valley agricultural community, the Tribe takes great pride in the quality of the farm product our ranching operation produces. Quality growth requires clean air, water and soil; a condition the Tribe can no longer take for granted. With assessment of the groundwater plume from the Anaconda Mine CERCLA site creeping north past neighboring irrigation wells and green fields, the Tribe is growing more and more concerned about the quality of the agricultural industry, so important to our way of life.

As highlighted in the Tribe's press release of December 19, 2011, a comprehensive study of the threat to area agriculture created by the Anaconda Mine Site is needed. Previous groundwater monitoring indicates a plume of metals and radionuclides that extends north from the site into a large agricultural area dependent on groundwater for irrigation. A large number of domestic wells in the same area have been found to be unfit and the residents, including the entire Yerington Paiute Reservation, are provided with bottled water for BP. With this effect on domestic wells documented, irrigation wells from the same area and generally same depth would reasonably be expected to suffer some of the same issues. Adding to this, when an irrigation well near the site was used for aquifer testing this fall, the water had to be moved onsite to lined ponds due to water quality issues.

We are familiar with the January 9, 2009 Technical Memorandum (*Onion Sampling, Part Farm, Yerington, Nevada*, prepared by CH2M Hill) regarding the issue of farm products and the mine. In that report, a total of four onions were analyzed for uranium. Results showed relatively low levels although a wide range of uranium concentrations was consistently detected. The onions had already been packaged for processing and/or distribution in fields near the site prior to sampling. Contrary to the report title, the onions may or may not have been from an area near the mine or even irrigated with groundwater due to use of Walker River water by the farm in question and their use of other properties extending beyond Mason Valley.

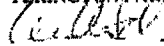
On December 21, 2011, Jeremiah Johnson, the EPA Region IX Superfund Project Manager gave notice to the local press that "Crops grown and livestock raised in the Verigton Area should be considered safe for consumption" apparently based on the analysis of those 4 onions in 2009. As I am sure you can recognize, with multiple heavy metals and radionuclides known to have been released from the Anaconda mine and now found in area groundwater, this statement may exceed the intent and scope of that small study.

In addition, EPA statements to the press are contrary to planning. An important agricultural irrigation feature for the valley, the Wabaska Drain, is an Operable Unit (OU7) for the Anaconda Mine Site. Statements by the EPA contrary to planned activities and previous studies for such an important topic has created yet another public relations hurdle for Mason Valley that must be addressed with both urgency and certainty.

In addition to monitoring agricultural products, the Tribe is very interested in the irrigation records, soils analysis, groundwater modeling and irrigation water monitoring that will be part of a complete study of the effect of the Anaconda Mine CERCLA site on area agriculture.

The Tribe looks forward to assisting EPA in developing this important study which can also be a strong start for data collection supporting the RI/FS for OU7. If you have any questions or need to schedule meetings or conference calls, please feel free to contact the office of the Deborah Dunn, at 775.463.3301 x234.

Sincerely,  
YERINGTON PAIUTE TRIBE



Linda L. Howard  
Tribe Chairman

cc: YPT Environmental Director  
Tom Olsen, BLM  
Jim Najima, NDEP  
Margaret Pauly, YOCAG  
John Krause, BIA  
Jim Sanford, MVEC  
WRPT Environmental Director  
Kerensa King, USFW  
Taurus Massey, Singano Peak Services



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

February 13, 2012

Linda L. Howard  
Tribal Chairman  
Yerington Public Tribe  
171 Campbell Lane  
Yerington, NV 89447

Dear Chairman Howard,

I am glad we were able to meet on February 2 to discuss progress in the investigation and cleanup of the Anaconda Mine site, and the value of working in partnership. EPA is committed to meeting our trust responsibilities to the Yerington Public Tribe. I appreciate the Tribe's concerns about the impacts of the site on the Tribe and the Mason Valley community.

In response to your letter of January 13, 2012 requesting a study of the impact of the site on Mason Valley agriculture, as we discussed, EPA considered many lines of evidence to determine that Mason Valley agricultural products are safe for consumption. In 2007, we conducted screening level sampling which focused on the agricultural products most likely to be impacted by site-related contamination. Our resulting risk communication took into account the results of our sampling, as well as other information, including the results of previous investigations into offsite contaminant migration pathways.

For Mason Valley agricultural products to be contaminated by the Anaconda Mine site, there would have to be complete exposure pathways that connect site contamination to the agricultural products. The pathways can include groundwater and surface water exposure and air deposition. Each of these pathways has been evaluated as part of the investigations of the Anaconda Mine site. All of the available information indicates that there are no apparent current complete exposure pathways for agricultural products in the area. As part of ongoing and planned investigations, additional data will be collected for each pathway. Should our investigations reveal new information that could suggest completed exposure pathways for contamination of local agricultural products, we will take immediate action to mitigate risk and protect human health and the environment.

Irrigation with contaminated groundwater or surface water is the most direct pathway for mine related contamination to affect Mason Valley agricultural products. In 2007, EPA collected and analyzed onions from fields located immediately north of the site which had been irrigated from a well that was known to contain elevated levels of uranium. The sampling focused on potential impacts to a crop grown in close proximity to the site, irrigated with water that was representative of the groundwater contamination, and potentially impacted by airborne transport of contaminated dust.

1.

EPA collected samples of two onions each from four bags of harvested onions while harvesting was taking place in the fields. The locations of the sampled bags are shown in the enclosed map and were randomly selected in the field by EPA's contractor with no input from the onion company. The eight onions were analyzed without washing or trimming, so the analytical results reflect the maximum possible contamination, including the onion flesh, the contribution of soil particles which adhered to the onions, and the roots and outer layers of the onions, which can contain higher concentrations of contaminants. The results showed that the concentration of uranium in the samples was very low, and even lower than typically reported for onions grown in the United States. The results indicated that the site had not affected the onions.

The wells impacted by contamination have been taken out of service and were last used for irrigation in 2009. Based on sampling that has been conducted as part of the groundwater investigation, other irrigation wells in the vicinity of the site are not drilled within the known plume of groundwater contamination. Available monitoring data in the vicinity of the other irrigation wells near the site indicates that water quality has not been affected by the mine. As part of the groundwater investigation, surface water samples have also been collected from the Walker River and the West Campbell Ditch, sources of irrigation surface water in the mine vicinity. Analyses have shown that the surface water has not been impacted by site contaminants.

As to the site's potential impact on soil in agricultural areas, in 2005, EPA's national experts in uranium sampling conducted an extensive scanner survey of the site and surrounding community to measure levels of elevated gamma-ray radioactivity relative to the surrounding environment. Scans were conducted on the mine site, the MacArthur Pit and haul road, the Wabaska rail spur, the YPT Reservation, the Mesa and Sunset Hills Drive area, the Fenrose development area, Laurier Road and Valley View Estates, locations in Mason Valley south of Yerington, Weed Heights and its access roads, the City of Yerington and adjacent roadways, and Schurz and roadways to the southeast. The results of the study indicated that radiological material from the site had not contaminated Mason Valley.


EPA continues to direct the Remedial Investigation for the Anaconda Groundwater Operable Unit (OU-1), and will begin discussion with Atlantic Richfield in the coming months on the scope of the Remedial Investigation for the Wabaska Drain Operable Unit (OU-7). In the past year, the groundwater monitoring network has been greatly expanded, both on site and off-site. As part of the investigations of OU-1, OU-7, and the other mine units, EPA will be further evaluating the impact of releases of mine contaminants on human health and the environment. If any of the evaluations show potential for impact to agricultural products or Tribal resources, EPA will ensure that the impacts are addressed.

EPA values the Tribe's participation and support in the investigation and cleanup of the Anaconda Mine site, and we will continue to involve the Tribe in our work. As we mentioned,



the EPA team will be in Yerington for a community meeting on February 29 and plans to have further discussions with Tribal representatives at that time. I appreciated the time you took to talk with us on February 2 and welcome an ongoing dialogue. If you have any questions or concerns about the Asaconda site, please feel free to call me at 415-947-8709, or send me an e-mail at [diamond.jane@epa.gov](mailto:diamond.jane@epa.gov).

Sincerely,



Jane Diamond  
Director  
Superfund Division

Enclosure: Onion Sample Locations

Cc: Dave Etna, NDEP  
JcT Page, Lyon County  
Dan Newell, City of Yerington  
Peggy Pauly, YCAG  
Jim Sanford, MVTG  
David Peck, Peri and Sons Farms  
Tara O'sen, BLM  
John Krause, BIA  
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Kerensa King, USFWS  
Thomas Massey, Singose Peak Services  
Jack Onian, Atlantic Richfield Company